



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Richard F. Neel, Jr., Treasurer
Republican Party of Virginia Inc.
115 East Grace Street
Richmond, VA 23219

MAY 22 2002

Identification Number: C00001305

Reference: 30 Day Post-Special Report (5/31/01-7/9/01)

Dear Mr. Neel:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The totals listed on Lines 6(c), 7, 11(a)(iii), 11(d), 19, 20, 21(a)(i), 21(a)(ii), 21(b), 22, 30, and 31, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the outstanding balance beginning the period of the next report. This report shows a beginning outstanding balance(s) to Cold Harbor Films, which is not identical to the ending outstanding balance(s) for the creditor(s) on the Amended 12 Day Pre-Special Report (1/1/01 - 5/30/01), received 2/27/02. Please amend your report to clarify the discrepancy.

-Schedule A supporting Line 15 of the Detailed Summary Page discloses a refund(s) or rebate(s) of what appears to be a previously disclosed allocable expense(s) from SMG/Richmond Coliseum. Please be advised that when a committee receives a refund or rebate of an allocable expense, it must be

allocated between the federal and non-federal accounts according to the same allocation ratio used to allocate the original disbursement. Furthermore, the federal account must transfer the non-federal portion to the non-federal account and disclose this transfer-out on Schedule H4. Your report does not appear to disclose a transfer-out of the non-federal portion of this refund(s) or rebate(s). Please provide clarification regarding this apparent omission.

-Schedule A supporting Line 12 discloses a transfer(s)-in from National Republican Congressional Committee. Schedule B supporting Line 21(b) reflects payments for yard signs. Please be advised that a state or local party committee may pay for campaign materials (such as bumper stickers) that are distributed by volunteers in connection with activity on behalf of the party's nominees in a general election. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used, including distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For farther guidance, please refer to 11 CFR §100.7(b)(15) and (17) and to the Campaign Guide for Party Committees.

Please clarify the nature of the transfer(s)-in and subsequent payments for the aforementioned disbursement(s). If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B or F supporting Line 23 or 25 of the Detailed Summary Page as appropriate.

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running

EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

-Schedule H4 discloses payments made to credit card companies for shared federal and non-federal activity. Please be advised that these payments must identify as memo entries, the original vendors from which you have purchased an item or service regardless of the amount. Please amend your report by providing the name and mailing address of the original vendor, along with the date, amount and purpose of each expenditure. 11 CFR §104.10.

-Schedule A of your report (pertinent portions attached) discloses one or more contributions which appear to be from a corporation(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the

acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designation and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Scott B. Walker
Reports Analyst
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

 Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 8/122

check one or more

☒ 11a ☐ 11b ☐ 11c ☐ 12 ☐ 17
☐ 13 ☐ 14 ☐ 15 ☐ 16

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

 NAME OF COMMITTEE (If Full)
 Republican Party of Virginia, Inc.

Full Name (Last, First, Middle Initial)		Date of Receipt
A. Mr. Eric Carter		08 / 06 / 2001
Mailing Address		
8528 Stonecroft Pl		
City	State Zip Code	
Glen Allen	VA 23060	
FEC ID number of contributing federal political committee		Amount of Each Receipt This Period
		200.00
Name of Employer	Occupation	
Carter & Carter	Attorney	
Receipt For:	Aggregate Year-to-Date	
Primary <input checked="" type="checkbox"/> General <input type="checkbox"/>	355.00	
Other (specify) <input type="checkbox"/>		
		Transaction ID: SA11A1.34104

Full Name (Last, First, Middle Initial)		Date of Receipt
B. Commonwealth of Va		08 / 12 / 2001
Mailing Address		
Department of Transportation		
City	State Zip Code	
Richmond	VA 23241	
FEC ID number of contributing federal political committee		Amount of Each Receipt This Period
		1307.60
Name of Employer requested	Occupation requested	
Receipt For:	Aggregate Year-to-Date	
Primary <input type="checkbox"/> General <input type="checkbox"/>	6030.00	
Other (specify) <input type="checkbox"/>		
		Transaction ID: SA11A1.35089

Full Name (Last, First, Middle Initial)		Date of Receipt
C. Casper Communications & Data		08 / 27 / 2001
Mailing Address		
2108 W Laburnum Avenue, Ste 350		
City	State Zip Code	
Richmond	VA 23227	
FEC ID number of contributing federal political committee		Amount of Each Receipt This Period
		2000.00
Name of Employer	Occupation	
Receipt For:	Aggregate Year-to-Date	
Primary <input type="checkbox"/> General <input type="checkbox"/>	2000.00	
Other (specify) <input type="checkbox"/>		
		Transaction ID: SA11A1.35084

SUBTOTAL of Receipts This Page (optional) 3507.60

TOTAL This Period (last page tries this number only)

FEC Schedule A (Revised 1/2000)

